

EXHIBIT O

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB- (PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

CONFIDENTIAL

VIDEO RECORDED 30(b)(6) DEPOSITION OF ZUFFA, LLC

BY IKE LAWRENCE EPSTEIN

December 2, 2016

LAS VEGAS, NEVADA

11:29 A.M.

Reported by:
Sarah Padilla, CCR NO. 929
Job No: 47777

IKE LAWRENCE EPSTEIN - CONFIDENTIAL

<p style="text-align: right;">86</p> <p>1 including the portion not specified in the purchase 2 agreement, was a non-compete component to be 3 classified as non-compete assets." 4 Do you see where it says that? 5 A Yup. 6 Q Is that accurate? 7 MS. GRIGSBY: Objection. Again, it's 8 actually -- that's not quite what that sentence 9 says. 10 THE WITNESS: Yeah. I don't know. I'm 11 not an accountant. I'm not a tax expert. This 12 looks like it's talking about allocation of a 13 purchase price over a period of years. And I'm just 14 not expert to answer that type of a question. So I 15 don't know whether it's accurate or not. 16 BY MR. WEILER: 17 Q Okay. And directing your attention to the 18 second sentence of this paragraph, it says, "The 19 reason for the acquisition was to control the WFA 20 brand and prevent it from competing with the WEC and 21 UFC." 22 Do you see where it says that? 23 A I do. 24 Q Is that accurate? 25 A No.</p>	<p style="text-align: right;">88</p> <p>1 THE VIDEOGRAPHER: We are back on the 2 record at 2:05. And this marks the beginning of 3 Media No. 3 of the deposition of Lawrence Epstein. 4 BY MR. WEILER: 5 Q Did Zuffa acquire an MMA promoter known as 6 Pride? 7 A Yes. 8 Q How did Zuffa come to purchase Pride? 9 A It is a long, long story. To summarize, 10 it actually started years before the deal was done 11 when Pride was the largest mixed martial arts 12 promoter in the world. They had actually approached 13 the UFC -- which had fairly recently been bought by 14 Frank and Lorenzo Fertitta -- about acquiring the 15 UFC or potentially acquiring the right to stage UFC 16 branded events in Japan and other Asian markets. 17 These discussions when on for some period 18 of time. And at some point during those 19 negotiations, I actually went with the Fertittas, 20 Dana White to an event in Japan where we watched 21 Chuck Liddell, who was one of the UFC fighters, 22 fight in a private event. I think that was 2003, 23 but I could be wrong about that. We had a lot of 24 discussions with them on that trip. I don't know if 25 you've ever been involved with negotiations with</p>
<p style="text-align: right;">87</p> <p>1 Q And what's inaccurate about that 2 statement? 3 A The entire thing. That's not the reason 4 for the acquisition of the WFA brand. I mean, is it 5 a small, little known brand or is it a competitor? 6 You've got two different characterizations in two 7 different paragraphs in the same page. 8 The WFA was brought to us by Louis Palazzo 9 and Ross Goodman. They put on one or two events. 10 The business was failing because they couldn't 11 manage it properly, I assume. And they wanted to 12 get out of the business. They sold -- they sold 13 some tapes and some fighter contracts and their 14 brand. That's what happened. This was not some 15 grand scheme to take them out of the market. 16 Q And so -- 17 A They took themselves out of the market. 18 Q So Zuffa had no intention of taking WFA 19 out of the market? 20 A No. 21 Q Go ahead. 22 THE VIDEOGRAPHER: This marks the end of 23 the Media No. 2 of the deposition of Lawrence 24 Epstein. We are off the record at 1:56. 25 (A brief recess was taken.)</p>	<p style="text-align: right;">89</p> <p>1 Japanese businesses, but it's very challenging. 2 It's a very different negotiating style than what we 3 have here in the United States. So nothing really 4 happened. 5 After some period of time, Pride began to 6 have some serious financial issues. It really 7 started with them being noted in a Japanese 8 publication as having connections with the Yakuza, 9 which is Japanese organized crime. These 10 publications in -- in a fairly well-circulated 11 magazine in Japan resulted in them losing their 12 television distribution deal with Fuji TV. Which 13 was very important to them, both from a monetary 14 standpoint and from a general exposure standpoint. 15 And their business began to really falter. 16 At that point, we had heard -- this is 17 probably in early 2006 or mid-2006 -- that they were 18 thinking about selling the business because they 19 were in financial difficulty. And once again, we 20 began negotiating with them. These negotiations 21 took months and months and months. There were 22 our -- our understanding there were other bidders 23 involved in the process. We ultimately reached a 24 deal sometime in, you know, second quarter of 2007 25 to buy the company. So it is truly something that</p>